

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS
Comment to file

Colonial Pipeline
Columbia, Virginia
Permit No. SCRO-30415

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Colonial Pipeline has applied for an administrative amendment to its Title V Operating Permit for its Columbia, Virginia facility. The Department has reviewed the application and has prepared the amendment to the Title V Operating Permit.

Engineer/Permit Contact:	<u>Anita L. Walthall</u> (434) 582-6238	<u>June 15, 2007</u>
Air Permit Manager:	<u>David J. Brown</u>	<u></u>
Regional Director:	<u>T. L. Henderson</u>	<u></u>

FACILITY INFORMATION

Permittee

Colonial Pipeline Company
7524 Jebstead Circle
Paw Creek, NC 28130

Facility

Colonial Pipeline Company, Mitchell Junction Facility
425 Duncan Store Road
Columbia, VA 23038

County-Plant Identification Number: 51- 049-0001

SOURCE DESCRIPTION

NAICS Code: 486910 - Pipeline Transportation of Refined Petroleum Products

Colonial Pipeline Company, Mitchell Junction is a Title V major source of VOCs. The facility is an existing source located in an attainment area for all pollutants, and is classified as synthetic minor for PSD.

COMMENT TO FILE

Colonial submitted an “ownership/name change” application to identify the facility’s most recent responsible official. The application did not contain any other changes requiring a review of the facility’s current emission limitations.

PUBLIC PARTICIPATION

Public review is not required for administrative amendments to federal operating permits. It is permissible to incorporate the requested name change without providing notice to the public or affected states as per 9 VAC 5-80-270 and 9 VAC 5-80-290. A revised permit is to be sent to EPA Region III.

(9 VAC 5-80-200 B)

COMMONWEALTH OF VIRGINIA
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STATEMENT OF LEGAL AND FACTUAL BASIS

Colonial Pipeline Company
Cumberland County, Columbia, Virginia
Permit No. SCRO30415

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Colonial Pipeline Company has applied for a Title V Operating Permit for its Columbia, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee

Colonial Pipeline Company
425 Duncan Store Road
Columbia, VA 23038

Facility

Colonial Pipeline Company
425 Duncan Store Road

County-Plant Identification Number: 51-049-00001

SOURCE DESCRIPTION

NAICS Code: 486910 – Pipeline Transportation of Refined Petroleum Products

Colonial Pipeline Company, Mitchell Junction is a pipeline breakout station. Petroleum products including gasoline and distillate fuels are stored at the facility. Products enter and exit the facility via pipelines (there is no product loading rack).

The facility is a Title V major source of VOC emissions. The source is located in an attainment area for all pollutants, and is a PSD minor source. Their NSR permit to operate a 1825 kW diesel-electric generator issued on April 30, 1997 was rescinded on December 12, 2005. The generator is no longer in operation at the facility.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Storage tank capacity in gallons							
910	S910	Storage tank for gasoline or equivalent material, GATX (1963)	2,814,000	Internal floating roof	-	VOC/HAP	-
911	S911	Storage tank for gasoline or equivalent material, GATX (1963)	5,544,000	Internal floating roof	-	VOC/HAP	-
912	S912	Storage tank for gasoline or equivalent material, GATX (1963)	1,386,000	Internal floating roof	-	VOC/HAP	-
913	S913	Storage tank for gasoline or equivalent material, GATX (1963)	2,268,000	Internal floating roof	-	VOC/HAP	-
914	S914	Storage tank for gasoline or equivalent material, GATX (1963)	5,544,000	Internal floating roof	-	VOC/HAP	-
915	S915	Storage tank for gasoline or equivalent material, GATX (1963)	3,360,000	Internal floating roof	-	VOC/HAP	-
916	S916	Storage tank for gasoline or equivalent material, GATX (1963)	1,806,000	Internal floating roof	-	VOC/HAP	-
917	S917	Storage tank for gasoline or equivalent material, GATX (1963)	1,386,000	Internal floating roof	-	VOC/HAP	-
918	S918	Storage tank for gasoline or equivalent material, GATX (1963)	2,268,000	Internal floating roof	-	VOC/HAP	-
919	S919	Storage tank for gasoline or equivalent material, GATX (1970)	5,040,000	Internal floating roof	-	VOC/HAP	-
930	S930	Storage tank for gasoline or equivalent material, GATX (1963)	1,008,000	Internal floating roof	-	VOC/HAP	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Storage tank capacity in gallons							
931	S931	Storage tank for gasoline or equivalent material, GATX (1963)	2,268,000	Internal floating roof	-	VOC/HAP	-
932	S932	Storage tank for gasoline or equivalent material, GATX (1963)	2,268,000	Internal floating roof	-	VOC/HAP	-
933	S933	Storage tank for gasoline or equivalent material, GATX (1963)	5,544,000	Internal floating roof	-	VOC/HAP	-
934	S913	Storage tank for gasoline or equivalent material, GATX (1963)	5,544,000	Internal floating roof	-	VOC/HAP	-
935	S935	Storage tank for gasoline or equivalent material, GATX (1963)	3,360,000	Internal floating roof	-	VOC/HAP	-
936	S936	Storage tank for gasoline or equivalent material, GATX (1963)	1,386,000	Internal floating roof	-	VOC/HAP	-
937	S937	Storage tank for gasoline or equivalent material, GATX (1963)	3,360,000	Internal floating roof	-	VOC/HAP	-
938	S938	Storage tank for gasoline or equivalent material, GATX (1963)	6,300,000	Internal floating roof	-	VOC/HAP	-
939	S939	Storage tank for gasoline or equivalent material, GATX (1963)	3,360,000	Internal floating roof	-	VOC/HAP	-
950	S950	Storage tank for distillate or equivalent material, GATX (1963)	2,814,000	External floating roof	-	VOC/HAP	-
951	S951	Storage tank for distillate or equivalent material, GATX (1963)	2,268,000	External floating roof	-	VOC/HAP	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Storage tank capacity in gallons							
952	S952	Storage tank for distillate or equivalent material, Dorcon (1963)	4,032,000	Vertical fixed roof	-	VOC/HAP	-
953	S953	Storage tank for distillate or equivalent material, Dorcon (1963)	5,040,000	Vertical fixed roof	-	VOC/HAP	-
960	S960	Storage tank for distillate or equivalent material, Dorcon (1963)	2,814,000	Vertical fixed roof	-	VOC/HAP	-
961	S961	Storage tank for distillate or equivalent material, Dorcon (1963)	3,360,000	Vertical fixed roof	-	VOC/HAP	-
962	S962	Storage tank for distillate or equivalent material, PDM (1963)	4,032,000	Vertical fixed roof	-	VOC/HAP	-
970	S970	Storage tank for distillate or equivalent material, Dorcon (1963)	4,032,000	Vertical fixed roof	-	VOC/HAP	-
971	S971	Storage tank for distillate or equivalent material, Dorcon (1963)	1,008,000	Vertical fixed roof	-	VOC/HAP	-
972	S972	Storage tank for distillate or equivalent material, Dorcon (1963)	1,806,000	Vertical fixed roof	-	VOC/HAP	-
973	S973	Storage tank for distillate or equivalent material, Dorcon (1963)	2,268,000	Vertical fixed roof	-	VOC/HAP	-
974	S974	Storage tank for distillate or equivalent material, Dorcon (1963)	2,814,000	Vertical fixed roof	-	VOC/HAP	-
975	S975	Storage tank for distillate or equivalent material, Dorcon (1963)	3,360,000	Vertical fixed roof	-	VOC/HAP	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Storage tank capacity in gallons							
976	S976	Storage tank for distillate or equivalent material, Dorcon (1963)	3,360,000	Vertical fixed roof	-	VOC/HAP	-
977	S977	Storage tank for distillate or equivalent material, Dorcon (1963)	2,814,000	Vertical fixed roof	-	VOC/HAP	-
978	S978	Storage tank for distillate or equivalent material, Dorcon (1963)	2,814,000	Vertical fixed roof	-	VOC/HAP	-

EMISSIONS INVENTORY

A summary of the 2005 emissions is attached. The actual emissions are summarized in the tables below.

Criteria Pollutant Emission (ton/yr)					
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
910-978	54.16	-	-	-	-
Fugitive	1.43	-	-	-	-
DO600	0.004	-	-	-	-
OW1	0.163	-	-	-	-
Total	55.757	-	-	-	-

Hazardous Air Pollutant Emission	
Pollutant	Emissions (ton/yr)
Benzene	0.54
Ethylbenzene	0.30
Hexane	0.99
Isooctane	0.41
MTBE	2.66
Toluene	1.44
Xylene	0.79
Total	7.17

EMISSION UNIT APPLICABLE REQUIREMENTS - Storage Tanks #: 910-919, 930-939, 950-953, 960-962, 970-978

Limitations

The permittee's Title V renewal application voluntarily requests to limit annual product

throughput. Therefore the following specifications are included in the Title V as applicable requirements:

- III.A.1. The annual throughput of gasoline shall not exceed 4,738,608,000 gallons, calculated monthly as the sum of each consecutive twelve (12) month period.
- III.A.2. The annual throughput of distillate fuel oil shall not exceed 2,482,704,000 gallons, calculated monthly as the sum of each consecutive twelve (12) month period.
- III.A.3. The annual throughput of kerosene shall not exceed 1,019,088,000 gallons, calculated monthly as the sum of each consecutive twelve (12) month period.
- III.A.4. The annual throughput of red dye shall not exceed 45,812 gallons, calculated monthly as the sum of each consecutive twelve (12) month period.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-80-110, "Permit Content", Federal Operating Permits for Stationary Sources

Monitoring & Recordkeeping

The periodic monitoring and recordkeeping requirements included in sections III B. a. and b. of the Title V permit are sufficient to assure compliance with calculated potential VOC and HAP emissions.

Compliance Assurance Monitoring (CAM) does not apply to this facility. The storage tanks do not require add-on controls in order to comply with the emission limits. The current recordkeeping requirements are federally enforceable and sufficient to maintain compliance with the permitted limits.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit requires submittal of semi-annual reports and annual compliance certification.

Streamlined Requirements

There are no streamlined requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Section B: Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement NO. 3-2001”.

Section F: Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Section U: Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Section Y: Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia

also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

FUTURE APPLICABLE REQUIREMENTS

Based on the data provided to calculate potential emissions, the facility is not a major emitter of hazardous air pollutants, and is not subject to any MACT requirements. See “inapplicable requirements” for more details.

INAPPLICABLE REQUIREMENTS

The inapplicable requirements identified by the applicant are as follows:

New Source Performance Standard (NSPS) requirements for Storage Vessels for Petroleum Liquid in 40 CFR Part 60, Subpart K and 9 VAC 5-40-410 are currently not applicable. The NSPS requirements do not include limitations or requirements for storage vessels (capacity greater than 65,000 gallons) constructed or modified **prior to** June 11, 1973.

New Source Performance Standard (NSPS) requirements for Storage Vessels for Petroleum Liquid in 40 CFR Part 60, Subpart Ka and 9 VAC 5-40-410 are currently not applicable. The NSPS requirements do not include limitations or requirements for storage vessels (capacity greater than 40,000 gallons) constructed or modified **prior to** May 18, 1978.

New Source Performance Standard (NSPS) requirements for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) in 40 CFR Part 60, Subpart Kb and 9 VAC 5-40-410 are currently not applicable. The NSPS requirements do not include limitations or requirements for storage vessels (capacity greater than 19,812 gallons) constructed, reconstructed or modified **prior to** July 23, 1984.

New Source Performance Standard (NSPS) requirements for Bulk Gasoline Terminals in 40 CFR Part 60, Subpart XX and 9 VAC 5-40-410 are currently not applicable. The source is not a product loadout facility.

National Emission Standards for Hazardous Air Pollutants requirements for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) in 40 CFR Part 63, Subpart R and 9 VAC 5-60-100 are currently not applicable. The facility is not a major source for HAPs.

The Chemical Accident Prevention Provisions in 40 CFR Part 68 Subpart A, are currently not applicable. The facility does not meet the definition of a stationary source as identified in §68.3.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹ 9 VAC 5-80-720	Pollutant Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
OW1	Oil/Water Separator	B.2	VOC	-
RDT1	Red Dye Storage Tank	B.2	VOC	-

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was published in the Farmville Herald from 3/31/06 to 4/30/06_.